LAWRENCE HINKLE (SBN 180551) lhinkle@sandersroberts.com 2 STEPHANIE JONES NOJIMA (SBN 178453) sjonesnojima@sandersroberts.com SANDERS ROBERTS LLP 3 1055 West 7th Street, Suite 3200 Los Angeles, CA 90017 4 Telephone: (213) 426-5000 Facsimile: (213) 234-4581 Attorneys for Plaintiffs and Counterclaim 6 Defendants HIDDEN EMPIRE HOLDINGS, LLC; HYPER ENGINE, LLC; DEON TAYLOR; AND THIRD-PARTY 8 DEFENDÁNT ROXANNE TAYLOR 9 10 UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA 11 12 HIDDEN EMPIRE HOLDINGS, LLC; CASE NO. 2:22-cv-06515-MWF-AGR 13 a Delaware limited lability company; HYPER ENGINE, LLC; a California Assigned for all purposes to the 14 Honorable Judge Michael W. Fitzgerald limited liability company; DEON TAYLOR, an individual, 15 PLAINTIFFS' COMPENDIUM OF **EXHIBITS IN SUPPORT OF** Plaintiffs, 16 MOTION FOR ORDER TO SHOW CAUSE WHY SANCTIONS v. 17 SHOULD NOT BE IMPOSED DARRICK ANGELONE, an individual; AONE CREATIVE LLC, formerly AGAINST DEFENDANTS FOR (1) 18 VIOLATING PRELIMINARY known as AONE ENTERTAINMENT INJUNCTION [CONTEMPT] AND 19 LLC, a Florida limited liability (2) SPOLIATION OF EVIDENCE company; ON CHAIN INNOVATIONS 20 LLC, a Florida limited liability [Submitted concurrently with Notice of company, Motion and Motion; Request for Judicial 21 Notice and [Proposed] Order] 22 Defendants. 23 Date: March 4, 2024 DARRICK ANGELONE, an individual; Time: 10:00 a.m. 24 AONE CREATIVE LLC, formerly Courtroom: 5A known as AONE ENTERTAINMENT 25 LLC, a Florida limited liability company; ON CHAIN INNOVATIONS LLC, a Florida limited liability 26 company 27 Counterclaimants, 28

ROBERTS

SUITE 3200 LOS ANGELES, CA 90017

1

HIDDEN EMPIRE HOLDINGS, LLC; 1 a Delaware limited lability company; HYPER ENGINE, LLC; a California limited liability company; DEON 2 TAYLOR, an individual, 3 Counterclaim 4 Defendants, 5 DARRICK ANGELONE, an individual; AONE CREATIVE LLC, formerly 6 known as AONE ENTERTAINMENT LLC, a Florida limited liability 7 company; ON CHAIN INNOVATIONS LLC, a Florida limited liability 8 company, 9 Third-Party Plaintiffs, 10 11 v. 12 ROXANNE TAYLOR, an individual, Third-Party Defendant 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

SUITE 3200 LOS ANGELES, CA 90017

2

TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, Plaintiffs Hidden Empire Holdings, LLC; Hyper Engine, LLC, and Deon Taylor ("Plaintiffs") hereby submit this Compendium of Exhibits in Support of their Motion for Order to Show Cause Why Sanctions Should Not Be Imposed Against Defendants for (1) Violating Preliminary Injunction [Contempt] and (2) Spoliation of Evidence.

DECLARATIONS

DECLARATION NO.	DECLARATION
1	Declaration of Roxanne A. Taylor
2	Declaration of Erin Burke
3	Declaration of Alex Izen
4	Declaration of Lawrence C. Hinkle II

EXHIBITS

EXHIBIT NO.	EXHIBIT
5	09/06/22 Email: Google Workspace Support to Darrick Angelone
6.	09/06/22 Email: Google Workspace Support to Roxanne Taylor
7.	09/07/22 Email: Roxanne Taylor to Google Workspace Support
8.	10/05/22 Email: Roxanne Taylor to Google Workspace Support
9.	10/06/22 Email: Google Workspace Support to Roxanne Taylor
10.	10/07/22 Email: Google Workspace Support to Roxanne Taylor

SANDERS ROBERTS 1055 W. 7TH STREET SUITE 3200 LOS ANGELES, CA 90017

EXHIBIT NO.	EXHIBIT
11.	10/10/22 Email: Google Workspace Support to Roxanne Taylor
12.	10/11/22 Email: Google Workspace Support to Roxanne Taylor
13.	10/12/22 Google Workspace Support Chat Transcript with Roxanne Taylor
14.	10/27/22 Email: Google Workspace Support to Roxanne Taylor
15.	11/1/22 Email: Google Workspace Support to Roxanne Taylor
16.	11/8/22 Email: Google Workspace Support to Roxanne Taylor
17.	10/4/22 Email: Darrick Angelone to Erin Burke
18.	10/04/22-10/05/22 Email: Darrick Angelone to Erin Burke with 09/07/22 Attachment (Domains)
19.	HEFG Admin Console Screenshot
20.	10/03/22 Email: Darrick Angelone to Erin Burke re Domains
21.	10/05/22 Email: Darrick Angelone to Erin Burke re Domains
22.	10/13/22 Email: Darrick Angelone to Erin Burke re Domains
23.	WHOIS Histories for Icelandic Domains
24.	10/14/22 Email: Darrick Angelone to Erin Burke re Aventviii
25.	11/22/22 Email: Darrick Angelone to Erin Burke re Aventviii Access Control



EXHIBIT NO.	EXHIBIT
26.	10/05/22 Email: Thread Between Erin Burke and Darrick Angelone re Social Media
27.	10/07/22-10/11/22 Email: Thread Between Darrick Angelone and Erin Burke re Twitter
28.	10/11/22 Email: Thread Between Darrick Angelone and Erin Burke re Instagram
29.	10/13/22 Email: Erin Burke to Darrick Angelone re Instagram Recap
30.	Tracy Wilkison Profile
31.	Chris Pluhar Profile
32.	Jacky Jasper Linkedin Profile
33.	09/09/14 Gawker Article re Kris Jenner
34.	01/05/16 New York Times Article re Charlie Sheen
35.	03/01/23 Hollywood Street King – Director Deon Taylor Chimes In On Jada Smith's Toxicity & Will Smith and Chris Rock's Masculinity
36.	03/29/23 Hollywood Street King – Deon & Roxanne Taylor's Hidden Empire Firm Group Sued for Multiple Counts of Fraud
37.	05/31/23 Hollywood Street King – Hidden Empire's Troubling Connections and Litigation Nightmare
38.	08/11/23 Hollywood Street King – Deon and Roxanne Taylor Ordered to Answer the Numerous Claims Filed Against Them by Former Partner
39.	08/22/23 Hollywood Street King – Deon Taylor Exposed: The 'Fake Friend' in Jamie Foxx's Scandalous Post
40.	09/18/23 Hollywood Street King – Deon Taylor's King



EXHIBIT NO.	EXHIBIT
	Bach Zoom Pitch Disaster, Ignorance on Full Display!
41.	09/26/23 Hollywood Street King – Deon Taylor's Unfiltered Take on Tyrese's Social Media Skills HSK Exclusive
42.	09/28/23 Hollywood Street King – Leaked Audio Exposes Deon Taylor and King Bach's Dubious Pasts Unveiled
43.	09/29/23 Hollywood Street King – In Leaked Audio Caleb Pinkett Reveals: Will Smith & Kevin Hart's Hollywood Power Dynamics
44.	10/02/23 Hollywood Street King – Deon Taylor's Wild R. Kelly Instagram Theory – Pedophilia Populism?
45.	10/03/23 Hollywood Street King – Inside the Zoom Leak: Will Smith's Race to Outshine the Rock & Kevin Hart
46.	11/03/23 Hollywood Street King – Civil Rights Icon Diane Nash Denounces Taylor's "Freedom Riders" Film
47.	12/19/23 Hollywood Street King – Mystery Patron: Billionaire Robert F. Smith's Link to Tinseltown's Secrets
48.	02/17/23 Hollywood Street King – Twitter Video of Deon Taylor
49.	08/7/23 Hollywood Street King – Twitter Post re Jamie Foxx Fake Friend
50.	Los Angeles Superior Court Register of Actions from HER Enterprises, et al. v. Jacky Jasper, et al.
51.	10/18/22 Google Subpoena
52.	02/1/23 Google Subpoena
53.	01/25/23, 02/18/23, 03/13/23 Google Responses and Productions
54.	02/01/23 Twitter Subpoena



EXHIBIT NO.	EXHIBIT
55.	04/18/23 Twitter Subpoena
56.	03/23/23, 09/21/23 Twitter Responses and Production
57.	10/18/22 Namecheap Subpoena
58.	11/15/22 Namecheap Production
59.	02/01/23 Charter Subpoena
60.	06/27/23 Charter Production
61.	Sanders Roberts Attorneys' Fees Billing Charts
62.	09/29/22 Official Court Reporter's Transcript of Hearing
63.	01/13/14 Transcript Testimony of Darrick Angelone in Angelone vs. Midway Rent a Car case

52
SANDERS
ROBERTS 1055 W. 7 TH STREET
SUITE 3200 LOS ANGELES, CA 90017

Dated: February 5, 2024 SANDERS ROBERTS LLP

y: _____

Lawrence Hinkle, Esq. Attorneys for Plaintiffs

HIDDEN EMPIRE HOLDINGS, LLC; HYPER ENGINE, LLC, AND DEON TAYLOR